

MITCHELL L. PASHKIN, ATTORNEY AT LAW

Mitchell L. Pashkin, Esq., Principal

Admitted

Supreme Court of the United States
United States Court of Appeals for the Second Circuit
Eastern, Southern and Western Federal District of New York
New York State

Cell: (631) 335-1107
Tel: (631) 629-7709
Fax: (631) 824-9328

mpash@verizon.net

775 PARK AVENUE, STE. 255, HUNTINGTON, NY 11743

Hon. Andrew L. Carter, Jr.
United States District Court
40 Foley Square
New York, NY 10007

Re: James Morales v Kavulich & Associates, P.C., et. al.
Civil Action File No. 1:16-cv-02134-ALC
Motion For Extension of Time to Answer

May 20, 2016

Dear Judge Carter:

I represent Defendants. I just was retained yesterday; and today I file my Notice of Appearance.

Defendants' Answer was due on May 16, 206. I have obtained the consent of Plaintiff's counsel for a 30 day extension of time to file an Answer on behalf of all Defendants. I write this letter seeking an Order from you allowing the above 30 day extension of time.

Defendants' failure to timely retain counsel or file an Answer was due to a medical issue with the person handling the case on behalf of the Defendants, Mr. Kavulich. Until recently, he was been in the hospital for a major surgical procedure. This resulted in the above delays.

Sincerely,
Mitchell L. Pashkin
Mitchell L. Pashkin